REMARKS

Claims 1-33 are pending in the present application. Claims 31-33 have been amended herewith. Reconsideration of the claims is respectfully requested.

Applicants would initially like to thank the Examiner for taking the time to conduct a telephonic interview with Applicants' attorney on June 29, 2005. While no agreement was reached, Applicants' attorney described how text-based windows such as a Unix shell window or a DOS command window are substantially different from a graphical user interface.

I.   Drawings

Applicants are submitting concurrently herewith a replacement sheet for sheet 1 of the drawings, in order to remove the label "(Prior Art)" which was erroneously included as a legend for Figure 7.

II.   Claims 1-30

Applicants graciously acknowledge the allowance of Claims 1-30.

III.   35 U.S.C. § 102, Anticipation

The Examiner rejected Claims 31-33 under 35 U.S.C. § 102 as being anticipated by Your First Cup of Java (For Unix). This rejection is respectfully traversed.

The present invention with respect to Claims 31-33 is directed to a method, system and program product for allowing two different types of native applications – a JAVA application and a UNIX application – to use a common *graphical* user interface. The cited reference merely shows use of a *text* user interface. As will be shown below in detail, a graphical user interface and a text user interface are substantially different, and a teaching of one (text user interface) does not teach or otherwise suggest the other (graphical user interface).

Specifically with respect to Claim 31, such claim recites:

A method in a computer system, said method comprising the steps of:

graphically presenting *native Java applications* within said computer system *utilizing a graphical user interface*; and graphically presenting *native UNIX applications* within said computer system *utilizing said graphical user interface*, wherein Java applications and UNIX applications are presented by said computer system *utilizing the same graphical user interface*. (emphasis added)

As can be seen, Java applications and UNIX applications are presented using the same *graphical* user interface. A graphical user interface is commonly known to those of ordinary skill in the art to be substantially different from a text or command line interface (see definition of Graphical User Interface in Appendix A and the definition of Command Line Interface in Appendix B, both of which are attached hereto). The reference cited in rejecting Claim 31 teaches use of a UNIX command shell, which is commonly known to those of ordinary skill in the art to be a *command* line interface (see definition of UNIX Shell in Appendix C, and Bash in Appendix D, both of which are attached hereto). The cited reference specifically states, on the bottom of page 2, that this interface is a *shell window*. As described above, and evidenced in the attached Attachments A-D, a shell window is a *text or command* window and thus is *not* a graphical user interface. A text window merely allows user interaction using text commands, whereas a graphical user interface allows user interaction using graphical images and widgets in addition to text (Appendix A; Appendix B).

It is thus urged that a teaching of a UNIX command shell for entering UNIX text commands and the teaching of a UNIX command shell for entering Java text commands does not teach (or otherwise suggest) the claimed steps of "graphically presenting *native Java applications* within said computer system *utilizing a graphical user interface*; and graphically presenting *native UNIX applications* within said computer system *utilizing said graphical user interface*. For example, as can be seen at page 7 of the cited reference, the 'Terminal' window is not part of a native Java application, as it is the identical Terminal window shown at page 3 of the cited reference, and thus is presented by the underlying UNIX operating system. Thus, this Figure 7 does not teach *graphically presenting native Java applications utilizing a graphical user interface*. At best, this

reference teaches presenting native Java applications utilizing a text or command user interface. While this Figure 7 also shows a "Window", "Edit" and "Options" area as part of the "Terminal" window, these areas do not display or present any type of information from a native Java application. Thus, to the extent this "Window", "Edit" and "Options" border area is being construed as teaching the claimed graphical user interface, this border area is not used to present native Java applications. In any event, Applicants have amended Claims 31-33 to further clarify this distinction. Thus, as every element of Claims 31-33 is not identically shown in a single reference, it is urged that Claims 31-33 are not anticipated by the cited reference.

Nor would Claims 31-33 be obvious in view of the cited reference. Graphical applications are very different from text-based applications, and in particular Java-based graphical applications are very different from UNIX-based graphical applications. As described in the background section of the present application, prior techniques of presenting graphical user interfaces required that the underlying windowing-portion be the same genre as the graphical application which presents graphical information. Java-based graphical user interfaces such as Java desktop were required to graphically present Java applications, and Unix-based graphical user interfaces such as a UNIX window manager were required to graphically present Unix applications. This is so, as the underlying coding and associated support systems such as dynamically-linked libraries are substantially different between such systems, and one is not compatible with the other. Without the benefit of the teachings of the present application, there is no indication in the cited reference of how one might modify the teachings contained therein to provide a common Java-based graphical user interface that supports both native UNIX and native Java applications. Although a device may be capable of being modified to run the way [the patent applicant's] apparatus is claimed, there must be a suggestion or motivation *in the reference* to do so. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990). It is thus urged that Claims 31-33 are not obvious in view of the cited reference.

Therefore, the rejection of Claims 31-33 under 35 U.S.C. § 102 has been overcome.

IV. Conclusion

It is respectfully urged that the subject application is patentable over the cited reference and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: _____7/6/05_____

Respectfully submitted,

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IN THE DRAWING:

Please replace sheet 1 of the drawings with the replacement sheet 1 being submitting concurrently herewith.